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States Government

Department of Energy

Rocky Flats Office

memorandum

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ACTION

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BURLINGAME, A.H.	
CARNIVAL, G.J.	
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CROUCHER, D.W.	
DAVIS, J.G.	
EVERED, J.E.	
FERRERA, D.W.	
GOODWIN, R.	
HANNI, B.J.	
HEALY, T.J.	
HILBIG, J.G.	
IDEKER, E.H.	
KERSH, J.M.	X
KIRBY, W.A.	
KRIEG, D.	
KUESTER, A.W.	
LEE, E.M.	
MAJESTIC, J.R.	
MARX, G.E.	
MORGAN, R.V.	
PIZZUTO, V.M.	
POTTER, G.L.	X
SANDLIN, N.B.	
SHEPLER, R.L.	
SULLIVAN, M.T.	
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APR 06 1992

WMED:MCV:3985

Clarification of Chelating Agents requirement in NVO-325.

N. C. Aquilina, Manager, Nevada Operations Office, DOE

The current plan for treatment of solar pond water is forced mechanical/thermal evaporation. The startup for the evaporators is scheduled for August, 1992. The distillate from this process will be reused in the Rocky Flats Plant's (RFP) raw water system, and the concentrate will be cemented for land disposal at the Nevada Test Site (NTS). It is planned to pre-treat pond water with up to 6-weight percent chelating agent, Ethylenediaminetetraacetic Acid (EDTA), to improve the efficiency of the evaporation process. It is expected that the cemented evaporator concentrate would not have any free chelant present. However, chelated complexes at concentrations greater than 1-weight percent will be present in the cemented evaporator concentrate.

Our planned treatment approach is directly dependent upon a clarification of the requirement for chelating agents in NVO-325. The current requirement (paragraph H of Section 2.2.1, General Waste Form Criteria) states:

"LLW containing chelating or complexing agents at concentrations greater than one percent by weight will not be accepted. This requirement also applies to LLMW."

NVO-325, (Draft, Rev. 1), dated October 1991, elucidates this requirement as follows:

"LLW containing chelating or complexing agents at concentrations greater than one percent by weight will not be accepted. Free chelating agents mobilize fixed heavy metal for migration in the environment. Again, the requirement also applies to LLMW."

RFP's interpretation of this requirement in NVO-325, (Draft, Rev.1), is that it applies only to the weight percent of free chelating agents (such as sodium EDTA) and not chelating agents that are complexed with chelatable metal ions. If you concur, it is suggested that the requirement be written as follows:

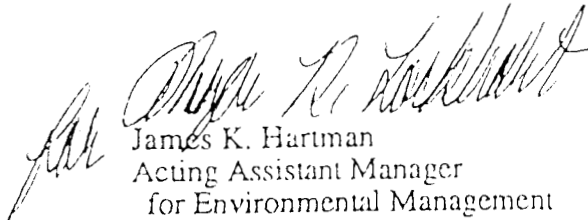
"LLW containing free chelating agents at concentrations greater than one percent by weight will not be accepted."

Reviewed for Addressee
Corres. Control: RFP

DATE BY

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→ Your concurrence on the RFP interpretation of the requirements or further guidance is essential to the successful completion of the Solar Pond Cleanout Project. If you have any questions or need further information, please feel free to contact Thomas E. Lukow of my staff at (303) 966-4561.


James K. Hartman
Acting Assistant Manager
for Environmental Management

cc:

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